

EXHIBIT C

Rachel Weil

From: Rachel Weil
Sent: Tuesday, June 24, 2025 1:29 PM
To: Ian T. Cross; Larry Margolis; Jon Marko; Michael Jones
Cc: Adam Masin; Sunny Rehsi; Dwan Sanders
Subject: Kohchise Jackson v. CHS TX, Inc., et al.

Counsel:

First, I wanted to introduce myself, as I recently joined Bowman and Brooke and this case team.

Second, in Defendants Corizon Health, Inc. and Keith Papendick, M.D.'s First Set of Interrogatories to Plaintiff, Interrogatory No. 1 asked you to "Identify each medical treater/facility (not including the Michigan Department of Corrections or Corizon Health, but including any other physician; medical professional; hospital; other medical facility; etc.) that provided Plaintiff with any type of medical care at any time from the year 2000 through the present, including after his incarceration ended with the MDOC, providing the dates or approximate dates of treatment and providing the chief health complaints (or other reasons) for which he saw each treater." Pursuant to your duty to supplement your responses, please provide us with the identities of any additional medical providers or facilities that have treated Plaintiff for any gastrointestinal issue, illness, disorder, or concern since October 8, 2020, when you responded to the Interrogatories.

Third, if you have collected any additional medical records since October 8, 2020 (your responses to the discovery requests suggest that you provided certain records directly to former defense counsel), please provide us with those updated records.

Thank you, Rachel Weil

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